

## **EXHIBIT X**

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*Attorneys for Plaintiff*  
**SONIA FELDMAN**

**UNITED STATES DISTRICT  
DISTRICT OF NEVADA**

SONIA FELDMAN, ) Case Number: 2:24-cv-00526-JCM-MDC  
Plaintiff, )  
v. ) **PLAINTIFF SONIA FELDMAN'S  
FIRST SET OF REQUESTS FOR  
ADMISSIONS SERVED ON DEFENDANT  
MARK ANTHONY SAWYER**  
MARK ANTHONY SAWYER, ET AL, )  
Defendants. )

PROPOUNDING PARTY: Plaintiff Sonia Feldman

RESPONDING PARTY: Defendant Mark Anthony Sawyer

1 RFA Set No: One

2 **PLAINTIFF'S 1ST SET OF REQUESTS FOR PRODUCTION OF ADMISSIONS**  
3 **SERVED ON DEFENDANT MARK ANTHONY SAWYER**

4 Pursuant to Rule 36 of the Federal Rules of Civil Procedure, Plaintiff Sonia Feldman, by  
5 and through her attorneys, hereby serves her 1st Set of Requests for Admissions to Defendant  
6 Mark Anthony Sawyer.

7 **INSTRUCTIONS**

8 If, in responding to this First Set of Requests for Admissions ("Requests"), Responding  
9 Party encounters any ambiguities when construing a Request, Responding Party shall respond to  
10 the best of his, her or its ability and such response shall set forth the matter deemed ambiguous,  
11 and the construction used in responding.

12 **DEFINITIONS**

13 1. "Person(s)" refers to and includes, without limitation and in the singular as well as the  
14 plural, natural persons, attorneys in fact, powers of attorney, partnerships, corporations, limited  
15 liability companies, firms, joint ventures, groups, businesses and other associations, law firms,  
16 estates, trusts, and all other organizations and entities, unless the context specifically indicates  
17 otherwise.

18 2. The terms "related to" and "referring to" or "associated with" means, in whole or in  
19 part, constituting, evidencing, concerning, regarding, containing, embodying, reflecting,  
20 describing, involving, identifying, stating, referring to, dealing with, or in any way pertaining to.

21 3. The term "communications" shall include, without limitation, all letters, emails,  
22 handwritten or typewritten notes, notebooks, sound and/or voice recordings, voicemails, text  
23 messages, instant messages on any messaging platform, transcripts of sound recordings, tapes or  
24 other sound/voice recordings, contracts, agreements, reports, computer records, audio and  
25 videotapes, messages, summaries, and/or any other documentation, however produced or  
26 reproduced, whether sent, received or neither, including the original, draft, copies, and non-  
27 identical copies and the transmittal of such information in any form whatsoever.

- 1       4. The terms "and" or "or" have both conjunctive and disjunctive meanings.
- 2       5. The terms "any" and "all" mean "each" and "every."
- 3       6. The terms "you" and "your" refers to Defendant Mark Anthony Sawyer.
- 4

5 **REQUESTS FOR ADMISSIONS:**

6 **Request for Admission No. 1:**

7 Admit that at the time you formed the MJS Nevada Trust you were insolvent?

8 **Request for Admission No. 2:**

9 Admit when you formed the MJS Nevada Trust, You owed more money than you had available  
10 to pay out to all those who had bridge loans with you if they all asked to withdraw their funds  
11 from your program.

12 **Request for Admission No. 3:**

13 Admit that you set up the MJS Nevada Trust while you were running a Ponzi scheme.

14 **Request for Admission No. 4:**

15 Admit that you set up the MJS Nevada Trust so you could hide your assets from Plaintiff.

16 **Request for Admission No. 5:**

17 Admit that you set up the Nevada MJS Trust so you could shield your assets from Plaintiff in  
18 case she sued you for the money you agreed to pay her.

19 **Request for Admission No. 6:**

20 Admit that during the period from January 29, 2021, when Plaintiff wrote her first check to you  
21 for \$10,000 on January 29, 2021, through the end of 2021, you were running a Ponzi scheme.

22 **Request for Admission No. 7:**

23 Admit you were using Plaintiff's monies to fund debts you owed others.

24 **Request for Admission No. 8:**

25 Admit that at the time you obtained Plaintiff's check for \$1,166, 337.13 you were insolvent.

1 **Request for Admission No. 9:**

2 Admit that at the time you obtained Plaintiff's check for \$1,166,337.13 you were unable to pay  
3 all the debts that you owed.

4 **Request for Admission No. 10:**

5 Admit that instead of using the Plaintiff's check for \$1,166,337.13 to make a bridge loan to  
6 others, you instead used that money to partially fund the Vegas Auto Gallery.

7 **Request for Admission No. 11:**

8 Admit that you lied to Plaintiff so she would invest over a million dollars in your bridge loan  
9 program.

10 **Request for Admission No. 12:**

11 Admit that you told Ms. Feldman you would be able to more than double her money by using her  
12 money in your bridge loan program.

13 **Request for Admission No. 13:**

14 Admit that when you told Ms. Feldman you would be able to more than double her money by  
15 using her money in your bridge loan program, that was a lie.

16 **Request for Admission No. 14:**

17 Admit that you promised to treat Plaintiff like your daughter.

18 **Request for Admission No. 15:**

19 Admit that you lied when you promised to treat Plaintiff like your daughter.

20 **Request for Admission No. 16:**

21 Admit that you lied when you promised to treat Plaintiff like your daughter in order to gain her  
22 trust.

23 **Request for Admission No. 17:**

24 Admit that you lied when you promised to treat Plaintiff like your daughter in order to gain her  
25 trust so she would agree to invest over a million dollars into your bridge loan program.

26 **Request for Admission No. 18:**

27 Admit that once you had Plaintiff's money, you convinced her to roll over her investments?

1 **Request for Admission No. 19:**

2 Admit that each time you convinced Plaintiff to roll over her investments you withheld the fact  
3 that you did not have the money to pay her if she had decided to withdraw her funds instead?

4 **Request for Admission No. 20:**

5 Admit that you used Plaintiff's money to fund your, and your wife's lavish lifestyle?

6 **Request for Admission No. 21:**

7 Admit that you formed the MJS Nevada Trust in order to prevent Plaintiff from recovering the  
8 money you cheated her out of?

9 DATED this 19<sup>th</sup> day of December, 2024.

10 **ALBRIGHT STODDARD, WARNICK &**  
11 **ALBRIGHT**

12 By:

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 19th day of December, 2024, a true and correct copy of the foregoing document was served via the Court's CM/ECF system on all parties currently on the electronic service list.

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**MJS NEVADA TRUST**  
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THE PROPERTY LOCATED AT:  
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4 By: //s// Phyllis L. Cameron

5 Employee of Albright, Stoddard, Warnick & Albright

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